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SUBJECT: Application for amend to License DPR-23,adding footnote to
 Tech Spec 3.5.3.3 Table 3.5.7,Item 3.a & 3.b.

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United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
REQUEST FOR EMERGENCY LICENSE AMENDMENT AND WAIVER OF COMPLIANCE.

Gentlemen:

In accordance with the Code of Federal Regulation, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant, Unit 2 (HBR2).

The proposed amendment would add a footnote to the Technical Specification 3.5.3.3 Table 3.5-7, Items 3.a and 3.b, required action b which would provide a one time change during Refueling Outage 13 to allow continued effluent releases (purging from the reactor containment vessel) with radiation monitors RMS-12 and RMS-11 and their associated backup monitors RMS-14 and RMS-34 out of service. The amendment will allow containment purging only with no fuel in containment and containment integrity not required.

This request is to allow installation of a modification to upgrade the Radiation Monitoring system during Refueling Outage 13. An amendment request to support that modification is currently under review by NRC. This amendment requires emergency handling and a waiver of compliance because during scheduling of outage work, it was realized that implementation of the upgrade would require the containment vessel monitors RMS-11 and RMS-12 and their back-up monitors, plant vent RMS-14 and RMS-34 to be out of service. Under these circumstances, current Technical Specifications (TS) would require suspension of releases through the plant vent. Continued purging is required to maintain reasonable environmental conditions for ongoing work in containment.

All releases from the containment vessel will be stopped (in accordance with existing technical specifications) if the noble gas activity exceeds $2E-5\mu\text{Ci/cc}$. This is the activity that will not exceed 10CFR50 limits if released at full CV purge flow rate for one year. This activity is well below the RMS-12 setpoint. Area radiation monitoring is provided by normal continuous Health Physics coverage in the containment vessel while work is ongoing.

Emergency handling in accordance with 10 CFR 50.91 is necessary in order to avoid an unnecessary outage extension which would result in prevention of resumption of power operation and an increase in overall personnel radiation exposure. The outage extension would result from our inability to proceed with the simultaneous removal from service of plant monitors RMS-11, 12, 14, and 34 in support of the RMS upgrade project. This potential delay cannot be

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avoided since alternate approaches would require a major revision to the modification, requiring that the monitors be taken out of service sequentially so that all four would not be inoperable at the same time. This would result in a significant increase in both complexity and elapsed time since work would be occurring around live monitors in sequence versus simultaneous work on a completely de-energized system. The overall impact could be an extension of up to two weeks in the outage duration.

A waiver of compliance for the affected Technical Specification is requested until the proposed amendment can be processed. A discussion of the circumstances surrounding the waiver is contained in Attachment 1.

Attachment 2 is a safety analysis. Attachment 3 is a significant hazards analysis. Attachment 4 is the changed Technical Specification page.

Questions regarding this matter may be referred to Mr. Leonard I. Loflin at (919) 546-6242.

Yours very truly,



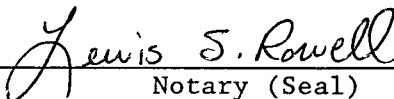
G. E. Vaughn
Vice President
Nuclear Services Department

JSK/cwh (844RNP)

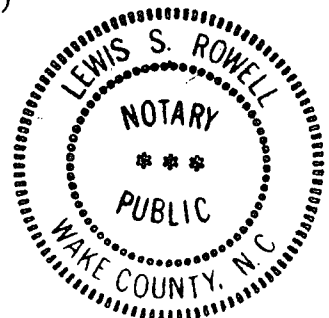
Enclosure

cc: Mr. S. D. Ebnetter
Mr. L. Garner (NRC-HBR)
Mr. R. Lo
Mr. H. G. Shealy (SC)
Attorney General (SC)

G. E. Vaughn, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.


Notary (Seal)

My commission expires: 7/12/94



Attachment 1
Basis for Waiver of Compliance Request

- (1) A discussion of the requirements for which a waiver is requested.

The Waiver of Compliance is requested with regard to the following Technical Specification:

Technical Specification 3.5.3.3, Table 3.5-7, Items 3.a and 3.b,
Required Action b.

This specification for the Radioactive Gaseous Effluent Monitoring Instrumentation for the Containment Vessel via the Plant Vent pathway requires that should either RMS-11, Radioparticulate Monitor, or RMS-12, Radionoble Gas Monitor, be out of service and both their backup monitors, RMS-14 and RMS-34, Plant Vent Radionoble Gas Monitors, also be out of service, all releases via the pathway be suspended.

The waiver is requested for the period until the emergency Technical Specification can be processed and allow the one time changes which will permit continued purging with the radionoble and radioparticulate monitors out of service.

- (2) A discussion of circumstances surrounding the situation including the need for prompt action, and a description of why the situation could not have been avoided.

The basis for the need for the waiver is identical to the need for the emergency Technical Specification as discussed in the cover letter.

- (3) A discussion of compensatory actions (if any).

Compensatory action during the waiver will be identical to the proposed amendment: containment purging may continue with radionoble and radioparticulate monitors RMS-11 and RMS-12 and their backup monitors RMS-14 and RMS-34 inoperable with no fuel in containment and containment integrity not required provided that a grab sample of the containment atmosphere is taken at least every 12 hours and analyzed within 24 hours.

- (4) A preliminary evaluation of the safety significance and potential consequences of the proposed request.

The safety significance of the waiver and potential adverse consequences of the waiver are minimal. During the waiver period, the reactor coolant system has been degassed during shutdown and there will be no fuel in containment, therefore there is no radionoble gas source term. Continuous particulate and iodine sampling using auxiliary sampling equipment will be performed in accordance with Technical Specification Table 4.10-2 as required by Table 3.5-7, items 1.c and 1.d. Plant effluent releases will continue through the normal filtered pathway.

- (5) A discussion which justifies the duration of the request.

The waiver is requested for a duration to allow the NRC to process an emergency amendment to permit the same actions which are proposed compensatory actions for the waiver.

- (6) The basis for the licensee's conclusion that the request does not involve a significant hazards consideration.

See Attachment 3

- (7) The basis for the licensee's conclusion that the request does not involve irreversible environmental consequences.

No irreversible environmental consequences are expected since effluent releases will continue through the normal filtered pathway. The waiver will be in effect only during periods when containment integrity is not required, with no fuel in the containment, and with the reactor coolant system degassed. Adequate monitoring will be provided for effluent accountability by the proposed compensatory action and by the monitoring in accordance TS Table 4.10-2. Thus any environmental consequences should be no greater than consequences resulting from operations under the existing Technical Specifications.

Attachment 2
Supporting Analyses/Safety Analyses

During Refueling #13 the reactor fuel has been offloaded from the reactor into the spent fuel pool and containment vessel integrity is not required. Prior to opening the reactor coolant system for defueling, the RCS was degassed per procedure GP-007, "Plant Cooldown from Hot Shutdown to Cold Shutdown" and OP-918, "Coolant Chemistry Addition and Control". This degassing operation removed virtually all of the Radionoble Gases as well as Hydrogen gas to within its required specifications, which has been confirmed by chemistry samples taken of the RCS that demonstrate that radionoble gas concentrations are at nondetectable levels. As required by Technical Specification 3.5.3.3, Table 3.5-7, Item 1.b, if RMS-14 is out of service and continued effluent releases via the plant via the plant vent stack are desired, a once per 12 hour grab sample is required to be collected and analyzed for radionoble gases within 24 hours. As required by Technical Specification 3.5.3.3, Table 3.5-7, Item 1.c and 1.d, under all modes of operation with RMS-34 out of service, a continuous particulate and iodine sample using auxiliary sampling equipment is performed in accordance with Technical Specification Table 4.10.2.

Since all of the reactor fuel is offloaded to the spent fuel pool there is no source for noble gases in the RCS. Since chemistry samples have demonstrated no detectable levels of radionoble gases and there is no source of noble gases in the RCS or containment no sampling for these gases should be required. Therefore, conservatively monitoring for radionoble gases is a safer condition.

The other limitations to apply to this Specification are that the fuel remain offloaded until R11 and R12 are returned to service. No operation requiring containment integrity may be conducted unless purging is halted.

Attachment 3
Significant Hazards Determination

Carolina Power & Light Company has reviewed the subject TS change request in accordance with the standards set forth in 10 CFR 50.92 and determined that this change does not constitute a significant hazard based upon the following considerations:

- (1) Operation of the facility, in accordance with the proposed amendment and waiver, would not involve a significant increase in the probability or consequences of an accident previously analyzed because for the duration of the use of this specification the reactor core is offloaded to the spent fuel pool. With the fuel offloaded, no accident previously evaluated impacting the reactor can occur.
- (2) Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated because with no fuel in the core and no changes to the facility occurring due to the Technical Specifications change no new kind of accident can occur.
- (3) Operation of the facility, in accordance with the proposed amendment, would not involve a significant reduction in a margin of safety because with no fuel in the reactor, no source term in the containment for radionoble gases, all purges going through particulate and carbon filters, and vent stack monitoring in accordance with the Technical Specifications being performed, no significant reduction in margin of safety can occur.